

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION

SOLAS OLED LTD., an Irish corporation,

Plaintiff,

v.

LG DISPLAY CO., LTD., a Korean  
corporation; LG ELECTRONICS, INC., a  
Korean corporation; and SONY  
CORPORATION, a Japanese corporation,

Defendants.

CASE NO. 6:19-CV-00236-ADA

JURY TRIAL DEMANDED

**DECLARATION OF BLAKE R. DAVIS IN SUPPORT OF DEFENDANTS' OPENING  
CLAIM CONSTRUCTION BRIEF**

I, Blake R. Davis, hereby declares and state as follows:

I am over the age of eighteen and I am of sound mind. I am an attorney at Latham & Watkins, LLP, counsel of record for Defendants LG Display Co., Ltd., LG Electronics, Inc., and Sony Corporation in the above-captioned matter. I have personal knowledge of the facts set forth herein. If called to testify, I could and would testify competently thereto.

1. Attached hereto as Exhibit 1 is a true and correct copy of Declaration of Douglas R. Holberg.

2. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from IEEE 100 The Authoritative Dictionary of IEEE Standards Terms, Seventh Edition, 2000 (defining “current”, “voltage”).

3. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from Hargrave’s Communications Dictionary, 2001 (defining “current”, “voltage”).

4. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from Microsoft Computer Dictionary, Third Edition, 1997 (defining “current”, “electromotive force”, “voltage”).

5. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the file history of the ’137 patent, 8/24/2010 Claims.

6. Attached hereto as Exhibit 6 is a true and correct copy of U.S. Patent Application No. 2004/0239596 (“Ono”).

7. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the file history of the ’137 patent, 08/24/2010 Response to Office Action.

8. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from The American Heritage College Dictionary, Fourth Edition, 2000 (defining “after”, “before”).

9. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from Bloomsbury

English Dictionary, Second Edition, 2004 (defining “after”, “before”).

10. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from Random House Webster’s Dictionary, Fourth Edition, 2001 (defining “after”, “before”).

11. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the file history of the ’891 patent, 02/19/2008 Response to Office Action.

12. Attached hereto as Exhibit 12 is a true and correct copy of U.S. Patent Application No. 2002/0101172 (“Bu”).

13. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from the file history of the ’891 patent, 08/23/2007 Appeal Brief.

14. Attached hereto as Exhibit 14 is a true and correct copy of excerpts from The American Heritage College Dictionary, Fourth Edition, 2002 ( defining “along”).

15. Attached hereto as Exhibit 15 is true and correct copy of excerpts from Webster’s New World College Dictionary, Fourth Edition, 2002 (defining “along”).

16. Attached hereto as Exhibit 16 is a true and correct copy of excerpts from Collins English Dictionary Complete and Unabridged, Sixth Edition, 2003(defining “along”).

17. Attached hereto as Exhibit 17 is a true and correct copy of excerpts from Solas’s Extrinsic Evidence Disclosure.

18. Attached hereto as Exhibit 18 is a true and correct copy of excerpts from Solas’s Infringement Contentions, Ex. B (’068 patent infringement charts).

19. Attached hereto as Exhibit 19 is a true and correct excerpted copy of excerpts from CMOS Analog Circuit Design, Second Edition, 2002.

20. Attached hereto as Exhibit 20 is a true and correct copy of excerpts from the file history for the ’068 patent, 02/04/2009 Response to Office Action.

21. Attached hereto as Exhibit 21 is a true and correct copy of U.S. Patent Application No. 2005/0099412.

22. Attached hereto as Exhibit 22 is a true and correct copy of U.S. Patent Application No. U.S. 2005/0067971.

23. Attached hereto as Exhibit 23 is a true and correct copy of U.S. Patent No. 7,501,999.

24. Attached hereto as Exhibit 24 is a true and correct copy of U.S. Patent No. 8,115,707.

25. Attached hereto as Exhibit 25 is a true and correct copy of U.S. Patent No. 8,502,754.

26. Attached hereto as Exhibit 26 is a true and correct copy of U.S. Patent No. 7,015,882.

27. Attached hereto as Exhibit 27 is a true and correct copy of Parties' Joint Revised List of Terms/Constructions, dated 03/06/2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 13, 2020 in Berkeley, California.

/s/ Blake R. Davis  
Blake R. Davis